Exhibit A

These requests concern the Passaic Valley Sewerage Commission (PVSC) collection system, which includes, but is not limited to, PVSC's treatment plants, pumping stations, outfalls, discharge points, trunk lines, pipes, intercepting sewers, lateral sewers, basins, tanks, and any other infrastructure or equipment used to collect, transport, treat, or discharge wastewater. Unless otherwise stated, the relevant time period for these document requests is from PVSC's inception in 1902 to the present.

- 1. All documents relating to all operating or discharge permits issued to PVSC, including, but not limited to:
 - a. All New Jersey Pollutant Discharge Elimination System (NJPDES) permits issued to the PVSC.
 - b. All National Pollutant Discharge Elimination System (NPDES) permits issued to the PVSC.
 - c. All other operating and discharge permits issued to the PVSC from its inception to present.
 - d. All documents prepared and/or submitted in accordance with the terms or requirements of NPDES, NJPDES or other operating permits issued to PVSC.
 - e. The interim and final operational plans for the PVSC that were required to be prepared by the PVSC's February 28, 1975 NPDES permit.
 - f. All documents concerning, referring and/or relating to PVSC permit modifications, renewals, revocations, and/or terminations.
 - g. All documents concerning PVSC facilities and/or operations prepared in association with issuance or re-issuance of NJPDES permits.
 - h. All documents concerning, referring and/or relating to any violation or potential violation of any permit issued to PVSC.
- 2. All documents concerning, referring or relating to authorized discharge points owned and/or operated by PVSC.
- 3. All documents concerning, referring and/or relating to all discharge points used by the PVSC system or interconnected with the PVSC that are owned by others, including but not limited to the City of Newark.
- 4. The April 16, 1996 CSO Characterization.

- 5. All documents concerning, referring and/or relating to sludge, slurries, solids and/or other byproducts or wastes produced as a result of operation of the PVSC treatment facilities.
- 6. All documents concerning the effluent or influent (including, but not limited to, the volume and content of the effluent or influent) discharged to or from the PVSC system.
- 7. All PVSC monitoring reports, including but not limited to quarterly priority pollutant metal monitoring and Priority Pollutant organic monitoring reports for the PVSC system.
- 8. All documents concerning, referring or relating to inspection, operation, maintenance, repair, improvement and/or assessment of PVSC facilities (including, but not limited to, wastewater treatment plants or outfalls).
- 9. All documents concerning construction, improvements and/or modifications to the PVSC system (including, but not limited to, requests for proposal, work plans, schematics, design documents, progress reports, and final reports).
- 10. PVSC annual reports and discharge monitoring reports from inception to present.
- 11. Notices of violation or other enforcement action documents issued to PVSC.
- 12. All documents submitted by PVSC in response to any notices of violation or other enforcement actions concerning, referring or relating to the operations of and/or discharges to/from the PVSC system.
- 13. All documents concerning, referring or relating to the impact of any discharge from any part of the PVSC system (e.g., treatment facility, discharge points, trunk lines, pipes, etc.) on the environment, including, but not limited to, the water or sediment of the Passaic River or any tributary.
- 14. All documents regarding combined sewer overflows or sanitary sewer overflows by PVSC.
- 15. All documents concerning, referring or relating to dry weather discharges from the PVSC system.
- 16. All documents concerning, referring or relating to overflow, bypass, or blending events at PVSC's facilities, trunk line, or outfalls.
- 17. All documents regarding PVSC's industrial pretreatment program.
- 18. All documents regarding a Total Maximum Daily Load for the Passaic River and/or Newark Bay.
- 19. All documents regarding PVSC prepared by Charles Manganaro or the Manganaro, Martin and Lincoln consulting engineering firm.

- 20. All documents regarding PVSC prepared by the Bogert-Childs consulting engineering firm.
- 21. All documents regarding PVSC prepared by Elson T. Killam Associates.
- 22. PVSC's responses to any requests for information by a government agency.